

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

ERIC D. HAYES,	)	CASE NO. _____
	)	
Plaintiff,	)	(From the District Court of Sarpy
	)	County, Nebraska, Case No. CI 14-1616)
v.	)	
	)	<b>NOTICE OF REMOVAL</b>
METROPOLITAN PROPERTY &	)	
CASUALTY INSURANCE COMPANY,	)	
	)	
Defendant.	)	

**COMES NOW** Defendant, Metropolitan Property & Casualty Insurance Company (“Met”), pursuant to 28 U.S.C. § 1322, § 1441, § 1446, and Fed. R. Civ. P. 81, and hereby gives notice of removal of this case to the United States District Court for the District of Nebraska. In support of this Notice of Removal, Met states as follows:

1. On October 17, 2014, Plaintiff initiated this action by filing a Complaint in the District Court of Sarpy County, Nebraska. The Complaint alleges that Plaintiff sustained damages in the amount of \$541,651.03, plus pre-judgment interest, interest after judgment, attorney’s fees pursuant to Neb. Rev. Stat. § 44-359, et seq., costs, and expenses. A true and correct copy of the Complaint is attached hereto as Exhibit “A.”
2. On or about October 20, 2014, Plaintiff filed a Praecipe for Summons, a true and correct copy is attached hereto as Exhibit “B.”
3. On October 21, 2014, the District Court of Sarpy County, Nebraska issued a Summons to Met, a true and accurate copy of which is attached hereto as Exhibit “C.”
4. The Complaint alleges that Plaintiff was at all material times a resident of

Springfield, Sarpy County. Nebraska.

5. Met is a corporation formed and existing under the laws of the State of Rhode Island with its principle place of business at 700 Quaker Lane, Warwick, Rhode Island 02887-0350.
6. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 because there is diversity of citizenship between Plaintiff and Defendant and the amount in controversy exceeds \$75,000.
7. Pursuant to 28 U.S.C. § 1446(d), Met will file a copy of this Notice of Removal with the Clerk of the District Court of Sarpy County, Nebraska and will serve a copy upon counsel for Plaintiff.

METROPOLITAN PROPERTY & CASUALTY  
INSURANCE COMPANY, Defendant,

BY: s/ Dan H. Ketcham  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

C.G. (Dooley) Jolly, #21275  
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s/ Dan H. Ketcham